

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

M.A., an individual,)	
)	
Plaintiff,)	Case No.: 2:19-cv-00849
)	
v.)	JUDGE ALGENON MARBLEY
)	
Wyndham Hotels and Resorts, Inc., <i>et.al.</i>)	MAGISTRATE JUDGE
)	ELIZABETH PRESTON DEAVERS
Defendants.)	

**JOINT MOTION TO SEVER AND DISMISS DEFENDANTS SIX CONTINENTS
HOTELS, INC., COLUMBUS HOSPITALITY, LLC, AND
HOLIDAY HOSPITALITY FRANCHISING, LLC**

Pursuant to Fed. R. Civ. P. 21 Plaintiff M.A. (the “Plaintiff”) and Defendants Six Continents Hotels, Inc., Columbus Hospitality, LLC, and Holiday Hospitality Franchising, LLC (the “IHG Defendants”) (collectively, the Plaintiff and the IHG Defendants are the “Parties”) move the Honorable Court to sever Plaintiff’s claims against solely the IHG Defendants and dismiss such claims with prejudice. Plaintiff and the IHG Defendants stipulate and agree that each party will bear their own costs.

Accordingly, the Parties hereby request that the Court sever and dismiss the IHG Defendants from this matter, with prejudice, pursuant to Federal Rule of Civil Procedure 21. This dismissal shall not affect the claims asserted by Plaintiff against any other Defendant in this case.

DATED: December 28, 2022

Respectfully Submitted,

/s/ Steven C. Babin, Jr. (by email consent)
Steven C. Babin, Jr. (0093584)
Babin Law, LLC
22 East Gay Street, Suite 200
Columbus, Ohio 43215
T: 614.384.7035

E: steven.babin@babinlaws.com
Counsel for Plaintiff M.A.

Kimberly Lambert Adams (*pro hac vice*)
Kathryn L. Avila (*pro hac vice*)
Christopher V. Tisi (*pro hac vice*)
Hilary Wood (*pro hac vice*)

**Levin, Papantonio, Rafferty,
Buchanan, O'Brien, Barr & Mougey,
P.A.**

316 S. Baylen Street, Suite 600
Pensacola, FL 32502
Tel: 850-435-7000
Fax: 850-436-6271
E-mail: kadams@levinlaw.com /
kavila@levinlaw.com /
ctisi@levinlaw.com /
hwood@levinlaw.com

Gregory M. Zarzaur (*pro hac vice*)
ZARZAUR
2332 Second Avenue North
Birmingham, Alabama 35203
T: 205.983.7985
F: 888.505.0523
E: gregory@zarzaur.com

Anil A. Mujumdar (*pro hac vice*)
DAGNEY JOHNSON LAW GROUP
2170 Highland Avenue, Ste #250
Birmingham, Alabama 35205
T: 205-509-1359
F: 205-809-7899
E: anil@dagneylaw.com
Counsel for Plaintiff M.A.

/s/ Steven A. Chang

Patrick Kasson (0055570)-Trial Attorney
Steven A. Chang (0088321)
Reminger Co., LPA
200 Civic Center Drive, 8th Floor
Columbus, OH 43215

Phone: (614) 228-1311
Fax: (614) 232-2410
pkasson@reminger.com
schang@reminger.com

William N. Shepherd (*pro hac vice*)
Florida Bar No. 88668
HOLLAND & KNIGHT LLP
777 South Flagler Drive
Suite 1900, West Tower
West Palm Beach, FL 33401
Tel: (561) 833-2000
Fax: (561) 650-8399
william.shepherd@hklaw.com

John M. Hamrick (*pro hac vice*)
Georgia Bar No. 322079
HOLLAND & KNIGHT LLP
Regions Plaza, Suite 1800
1180 W. Peachtree Street NW
Tel: (404) 898-8111
Fax: (404) 541-4411
Atlanta, GA 30309
john.hamrick@hklaw.com
*Counsel for Defendants Holiday Hospitality
Franchising, LLC and Six Continents Hotels, Inc.*

/s/ Quintin F. Lindsmith (by email consent)

Quintin F. Lindsmith (0018327)-Trial Attorney
Bricker & Eckler LLP
100 South Third Street
Columbus, Ohio 43215
614-227-2300
qlindsmith@bricker.com
Counsel for Defendant Columbus Hospitality

CERTIFICATE OF SERVICE

I hereby certify that on December 28, 2022, a copy of the foregoing JOINT MOTION TO SEVER AND DISMISS DEFENDANTS SIX CONTINENTS HOTELS, INC., COLUMBUS HOSPITALITY, LLC, AND HOLIDAY HOSPITALITY FRANCHISING, LLC was filed electronically via the Court's CM/ECF electronic filing system. Notice of this filing will be sent by operation of the Court's case management and electronic filing system. Parties may access this filing through the Court's case management and electronic filing system.

Respectfully Submitted,

/s/ Steven A. Chang